$\frac{}{de\ maximis,\ inc.}$

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December 20, 2013

Stephanie Vaughn U.S. Environmental Protection Agency, Region II 290 Broadway New York, New York 10007-1866 Via Electronic Mail

Re: LPR/NB Modeling Code Submission- Lower Passaic River Study Area (LPRSA) Administrative Agreement and Order on Consent for Remedial Investigation/Feasibility Study (RI/FS) - CERCLA Docket No. 02-2007-2009

Dear Ms. Vaughn:

The Lower Passaic River Study Area Cooperating Parties Group (CPG) is submitting hydrodynamic, sediment transport, organic carbon simplification, chemical fate and bioaccumulation codes, input and output files and supporting files for the purposes of discussion and collaboration between USEPA and the CPG on the LPRSA RI/FS.

Please note this information is being provided for discussion purposes only between USEPA Region 2 and the CPG. This submission does not constitute a deliverable as defined by the May 2007 RI/FS Settlement Agreement.

The following materials have been provided under separate cover by Anchor QEA, Moffat and Nichol, and Windward directly to Hydroqual/HDR:

- The hydrodynamic model inputs/outputs and linkage files for the calibration period WY1995-WY2012
- The sediment transport inputs/outputs for the calibration period WY1995-WY2012
- Code version used for sediment transport calibration runs
- OC linkage program, script to pre-process inputs and develop OC linkage file, and example OC linkage file for WY1996
- CFT model inputs, outputs (zipped) and run scripts for the 45 years projection period for 2,3,7,8-TCDD for requested projection alternatives:
 - o Alt 1: MNR
 - o Alt 2: Targeted removal (500 ppt) (this is the same as Alt 2a)
 - Alt 3: Cap/Dredge with EPA schedule
 - o Alt 4: Full dredge with EPA schedule
 - o Alt 5: Cap/Dredge with realistic schedule
 - o Alt 6: Full dredge with realistic schedule
- CFT model inputs, outputs and run procedures for the long-term (WY1995-WY2009) and short-term (WY2010-WY2012) calibration periods for 2,3,7,8-TCDD, for the same model version as used in the above projections
- The RCATOX model code version used in all of the above simulations

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- Temporal plots of the mean 0-15 cm sediment 2,3,7,8-TCDD concentrations for RM 0-8 and RM 0-17 as shown in the July EPA-HQ meeting
 - o As noted during the November 14 EPA/CPG modeling meeting, Alternatives 1, 2, and 5 were re-run in October due to an input error in the dredging schedule implementation. The updated results are shown on these plots.
- Bioaccumulation Model Template Steady State
- Bioaccumulation Model Template Dynamic
- Dynamic Bioaccumulation Model Input Template

The model codes, inputs and outputs are consistent with the model version described in the November 14th modeling meeting, and shown in the December EPA-HQ meeting. The above-referenced modeling information will provide USEPA a detailed understanding of the work being conducted by the CPG as it pertains to the LPRSA RI/FS and its development of the Sustainable Remedy.

The CPG is providing this information with the understanding that it will not be distributed outside of the USEPA and its technical contractors prior to discussions between USEPA and the CPG.

The CPG requests that the meetings discussed in USEPA Region 2's October 23, 2013 letter, during the EPA-CPG November 14 modeling meeting and the CPG's November 22, 2013 letter be scheduled for January and February 2014 as agreed.

In addition, the CPG requests that USEPA Region 2 provide the CPG with its most recent modeling codes, input and output files from its FFS modeling work including the BSAF calculations that it is using in lieu of a bioaccumulation model; the CPG believes the upcoming modeling meetings would greatly benefit and be more productive if both parties were familiar with all of the ongoing modeling efforts.

Please contact Bill Potter or me to discuss.

Very truly yours,

de maximis, inc.

Robert Law, Ph.D.

CPG Project Coordinator

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cc: Walter Mugden, EPA Region 2
Ray Basso, EPA Region 2
Jim Woolford, EPA HQ
Steve Ells, EPA HQ
Marc Greenberg, EPA HQ

CPG Members William Hyatt, CPG Coordinating Counsel

Willard Potter, de maximis, inc.